

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

NAUTILUS INSURANCE COMPANY,

Petitioner,

vs.

Richard Alexander Murdaugh, Sr., Cory
Fleming, MOSS & KUHN, P.A., Chad
Westendorf, and PALMETTO STATE BANK,

Respondents.

Civil Action No. 2:22-cv-1307-RMG

**RESPONSE TO PLAINTIFF’S
MOTION TO DEPOSE
DEFENDANT CORY FLEMING**

In response to Plaintiff’s Motion to Depose Defendant Cory Fleming (ECF No. 176) (“Motion to Depose”), an inmate of the Federal Correctional Institution in Jessup, Georgia (“FCI Jessup”), Defendant, Cory Fleming, by and through his undersigned counsel,

- 1) does not oppose the motion to take Mr. Fleming’s deposition, if leave is granted to depose Mr. Fleming, as it relates to the claims and defenses in this matter; 2)
- 2) Mr. Fleming objects to the unfounded statements and characterizations of the allegations directed at Mr. Fleming that are stated in the Motion to Depose; and
- 3) submits that such deposition would need to be subject to the logistical arrangements made with counsel for Mr. Fleming and FCI Jessup.

Respectfully submitted,

/s/ Thomas A. Pendarvis

Thomas A. Pendarvis (Fed. Id. 5785)

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